

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

CHARLES TOWNSLEY, MICHAEL
SAURO, WALTER NOFFSINGER,
ROSA DAVIDSON, MICHAEL
KELLY, TITON HOQUE, JANET
GELPHMAN, THANH DO

Plaintiffs,

VS.

INTERNATIONAL BUSINESS
MACHINES CORPORATION,

Defendant.

Civil Action No.: 1:20-cv-00969-LY

PLAINTIFFS' DESIGNATION OF EXPERTS, POTENTIAL FACT WITNESSES AND EXHIBITS

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiffs Charles Townsley, Michael Sauro, Walter Noffsinger, Rosa Davidson, Michael Kelly, Titon Hoque, Janet Gelpman and Thanh Do (“Plaintiffs”), and pursuant to the Court’s Scheduling Order and agreement by party, hereby submit the following Designation of Potential Witnesses, Testifying Experts, and Proposed Exhibits.

Respectfully submitted,

WRIGHT & GREENHILL, P.C.
900 Congress Avenue, Suite 500
Austin, Texas 78701
512/476-4600
512/476-5382 (Fax)



By: _____

Heidi A. Coughlin
State Bar No. 24059615

hcoughlin@w-g.com

Archie Carl Pierce

State Bar No. 15991500

cpierce@w-g.com

Blair Leake

State Bar No. 24081630

bleake@w-g.com

and



By: _____

Kaplan Law Firm

Austin Kaplan

State Bar No. 24072176

akaplan@kaplanlawatx.com

Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on 15th day of February, 2022, I electronically filed the foregoing Plaintiffs' Designation of Experts, Potential Fact Witnesses and Exhibits with the Clerk of Court using the CM/ECF system, which sent notification of such filing to the Court and Defendant's counsel.



Heidi A. Coughlin

I. DESIGNATION OF POTENTIAL FACT WITNESSES

The following are hereby designated as potential fact witnesses at trial by Plaintiffs:

1. Charles Townsley, c/o Heidi Coughlin, Esq. Plaintiff in this lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
2. Michael Sauro, c/o Heidi Coughlin, Esq. Plaintiff in this lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
3. Walter Noffsinger, c/o Heidi Coughlin, Esq. Plaintiff in this lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
4. Rosa Davidson, c/o Heidi Coughlin, Esq. Plaintiff in this lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
5. Michael Kelly, c/o Heidi Coughlin, Esq. Plaintiff in this lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
6. Titon Hoque, c/o Heidi Coughlin, Esq. Plaintiff in this lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
7. Janet Gelpman, c/o Heidi Coughlin, Esq. Plaintiff in this lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
8. Thanh Do, c/o Heidi Coughlin, Esq. Plaintiff in this lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
9. Arvind Krishna, IBM Chairman and CEO – information regarding IBM's culture, employment branding, employment discrimination, firing/hiring patterns and practices, competitive strategies for attracting, engaging, and retaining Millennials and similar subjects.
10. Virginia M. Rometty, former IBM CEO – information regarding IBM's culture, employment branding, firing/hiring patterns, workforce rebalancing/transformation, movement into CAMS, competitive strategies for attracting, engaging, and retaining Millennials and similar subjects.
11. Michelle Peluso, IBM CMO – information regarding IBM's culture, employment branding, Reinvention in the Age of the Millennial.
12. Nickle LaMoreaux, IBM CHRO – information regarding IBM's culture, employment branding, recruitment strategies, hiring/firing patterns, RIFs, best HR practices, and similar subjects.
13. Diane Gherson, former IBM CHRO – information regarding IBM's culture, employment branding, recruitment strategies, hiring/firing patterns, RIFs, best HR practices, and similar subjects.
14. Michelle H. Browdy, Esq., IBM General Counsel – information regarding IBM's culture, firing/hiring patterns, workforce rebalancing, separation and release agreements with ADEA carve-out.

15. Jon Iwata, Former IBM Senior Vice President, Marketing and Communications – IBM’s culture and employment branding, marketing strategies, IBM Values.
16. Ken Keverian, IBM Senior Vice President, Corporate Strategy – information regarding IBM’s culture, employment branding, firing/hiring patterns, workforce rebalancing/transformation, movement into CAMS, competitive strategies for attracting, engaging and retaining Millennials and similar subjects.
17. Steve Cowley, IBM General Manager of Cloud Sales in charge of Cloud sales worldwide, NY – information regarding IBM’s culture for Cloud sales, Cloud sales layoff mix, and Cloud Pak System.
18. Sam Ladah, HR Vice President, IBM Talent/IBM Cloud, GTS.
19. Steven Lasher, IBM employee, former CFO of Hybrid Cloud.
20. Robert LeBlanc, former IBM employee, VP of Cloud.
21. Alan Wild, IBM employee, former head of Resource Project Office.
22. Robert Delbene, IBM employee, comptroller.
23. James Kavanaugh, IBM employee, current CFO.
24. Martin Schroeter, former IBM CFO.
25. Yara Saad, IBM former employee, HR VP.
26. Ritika Gunner, IBM VP, Cognitive and Cloud Technologies, Austin – hiring.
27. Stephen Leonard, Current IBM employee, General Manager North America.
28. Lou Attanasio, former IBM employee, General Manager of Sales.
29. Carol Gordon, IBM employee, VP of talent - Member of HRMB.
30. Clint Parker, former employee of IBM -Testimony regarding the pattern and practice of discrimination at IBM;
31. Scott Simmons, former employee of IBM - Testimony regarding the pattern and practice of discrimination at IBM.
32. Alex Donatelli, IBM Distinguished Engineer (AI Applications, IBM Maximo) – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Davidson.
33. Wei Shan, IBM employee – testimony regarding IBM’s pattern and practice of discrimination related to Plaintiff Davidson.
34. Heather Hinton, DE IBM Hybrid Cloud – testimony regarding the knowledge of IBM’s pattern and practice of discrimination related to Plaintiff Davidson.
35. Robert Lord, IBM Cognitive Applications Supervisor - testimony IBM’s pattern and practice of discrimination related to Plaintiff Davidson.
36. Kareemm Yusuf, IBM Watson Internet of Things (IoT) Supervisor – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Davidson.

37. Lisa Wood, IBM Watson Internet of Things (IoT) Engineering Supervisor - information regarding IBM's pattern and practice of discrimination related to Plaintiff Davidson.
38. Lenny Scolaro, IBM Support & Cloud Ops (US) Supervisor – information regarding IBM's pattern and practice of discrimination related to Plaintiff Davidson.
39. Jeff Dean, retired IBM employee – information regarding IBM's pattern and practice of discrimination related to Plaintiff Davidson.
40. Fernando Cabrera Giglio, IBM System Support & Install QA & Central Security (Brazil) Supervisor – information regarding IBM's pattern and practice of discrimination related to Plaintiff Davidson.
41. Usman Malik, IBM Technical Lead, Secure Operations – information regarding IBM's pattern and practice of discrimination related to Plaintiff Davidson.
42. Heidi Modica, IBM Business Controls & MMT Rep for Security - information regarding IBM's pattern and practice of discrimination related to Plaintiff Davidson.
43. Laura Neathery, IBM Data Privacy – information regarding IBM's pattern and practice of discrimination related to Plaintiff Davidson.
44. John Klonowski, IBM Chief Information Security Officer – information regarding IBM's pattern and practice of discrimination related to Plaintiff Davidson.
45. Tim Hahn, IBM Watson IoT Business Information Security Officer – information regarding IBM's pattern and practice of discrimination related to Plaintiff Davidson.
46. Robert Maley, IBM System Support & Install QA & Central Security (US) Supervisor – information regarding IBM's pattern and practice of discrimination related to Plaintiff Davidson.
47. Rene Neumann, IBM Manager, Power System Performance – information regarding IBM's pattern and practice of discrimination related to Plaintiff Do.
48. Rex Berridge, IBM Program Director - Cognitive System Performance – information regarding IBM's pattern and practice of discrimination related to Plaintiff Do.
49. Sujatha Kashyap, former IBM Program Director - Cognitive System Performance – information regarding IBM's pattern and practice of discrimination related to Plaintiff Do.
50. Myhong Nguyenphu, IBM Vice President, Development, System Performance – information regarding IBM's pattern and practice of discrimination related to Plaintiff Do.
51. Monica Aggarwal, IBM Vice President, Cognitive Systems Development – information regarding IBM's pattern and practice of discrimination related to Plaintiff Do.
52. Stephen Leonard, General Manager, IBM Cognitive Systems – information regarding IBM's pattern and practice of discrimination related to Plaintiff Do.
53. Tom Rosamilia, Senior Vice President, IBM Systems and Chairman, North America – information regarding IBM's pattern and practice of discrimination related to Plaintiff Do.
54. Drew Valentine, Vice President, Human Resources, IBM Systems & Technology- information regarding IBM's pattern and practice of discrimination related to Plaintiff Do.

55. Marc Jones, former CTO of IBM Softlayer – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
56. Darin Duvall, IBM UX Infrastructure Director – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
57. Dr. Diana Harrelson Hubbard, former IBM employee – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
58. Yogi Vijayakumar, IBM UI Lead Cloud Object Storage – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
59. Ceci Morales, IBM UX designer - information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
60. Ryan Hawkins, IBM Lead Offering Manager for Mass Data Migration in storage – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
61. Katie Morgan, Lead Product Manager at IBM Cloud – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
62. Matthew Cunningham, Design Program Director at IBM Cloud – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
63. Amy Blea, former IBM Offering Manager for IBM Cloud Block and File Storage products – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
64. Michael Fork, IBM Director Storage group – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
65. Alexander Meyer, IBM (Ireland) Lead of UX storage group – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
66. John Neumann, former IBM UX research for storage – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
67. Alison Entsminger, Design Lead, Red Hat Marketplace (Operated by IBM) – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
68. Alex Hadik, former IBM Front End Developer, UX Designer - BlueMix/Cloud Foundation Services – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
69. Jeoff Wilks, IBM Director, Carbon design system – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
70. Ty Tyner, Design Program Director IBM Cloud Infrastructure – information regarding IBM’s pattern and practice of discrimination related to Plaintiff Gelpman.
71. Bill Grady, Head of Design IBM Cloud-information IBM’s pattern and practice of discrimination related to Plaintiff Gelpman; IBM’s culture, employment branding.
72. David Gelpman, Plaintiff Gelpman’s brother – information regarding the factual basis of

her claims and damages as well as Defendant's actions and defenses.

73. Carlos Cascante Arguedas, IBM Service Availability Manager – information regarding IBM's pattern and practice of discrimination related to Plaintiff Hoque.
74. Diego Filipuzzi Jiminez, IBM Manager. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Hoque.
75. John Crouse, IBM Service Availability Manager. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Hoque.
76. Karima Johnson, IBM Director. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Hoque.
77. Samit Nabar, IBM Service Delivery Manager. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Hoque.
78. Vance Wilson May, DPE at IBM. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Hoque.
79. Arvind Parthasarathy, IBM Senior Service Integration Leader. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Hoque.
80. Ellen Vest, IBM 1st Line Manager. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Hoque.
81. Divy Mohanty, IBM 1st Line Manager. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Hoque.
82. Paola Sonia Jimena Lehtman, IBM (Argentina) Service Availability Manager. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Hoque.
83. Allen Downs, IBM VP, BCRS Global Sales and Consulting. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
84. Timothy Eddy, Operations Program Manager - Cloud Services & Solutioning at IBM. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
85. Patti Fiette, former Worldwide Sales and Business Partner Enablement for Watson Explorer and Content Svcs, IBM Analytics. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
86. Mike Garcia, IBM employee. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
87. Indraneel Ghosh, IBM employee. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
88. Andrew Gill, IBM Director, STG Channels UKI, Systems and Technology Group. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
89. Emilio Griman, Director of Center of Competency, IBM Resiliency. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.

90. Russell Mandel, Concerns & Appeals Program Director at IBM. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
91. Jaime Moreno, Senior Manager, Distinguished Researcher at IBM Research. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
92. Rahul Pikle, MEA Sales Lead at IBM. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
93. Andrea Sayles, General Manager, Business Resiliency Services at IBM. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
94. Manish Semwal, Global Offering Manager - Resiliency Services at IBM. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
95. Manasi Telang, MEA Resiliency Services Sales Leader at IBM; Telephone number. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
96. Daniel Witteveen, VP, IBM Technology Support Services. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Kelly.
97. Michael Gilfix, IBM VP Product Management. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
98. Richard Heitmann, VP at IBM. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
99. Alberto Jimenez, IBM Director CPS and then WebSphere and CP4Apps. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
100. Jagan Karuturi, IBM VP Channel Partners. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
101. Rob Lamb, VP at IBM. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
102. Danny Mace, IBM VP Development. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
103. Melissa Modjeski, IBM Director of Development. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
104. Ken Parmelee, IBM Director. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
105. Laura Pimental, IBM Director HR. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
106. Ian Robinson, IBM Chief Architect. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
107. Savio Rodriguez, IBM VP Product Management. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
108. Stephan Warwick, IBM VP. This person has knowledge of IBM's pattern and practice of

discrimination related to Plaintiff Noffsinger.

109. Nikki Woodward, IBM Program Director. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
110. Justin Youngblood, IBM VP of Security. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Noffsinger.
111. Brigitte Anschuetz, former IBM employee. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Sauro.
112. Nick Falkingham, former IBM Analytics Predictive & BI Global Services Executive. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Sauro.
113. Kim Siegel, Vice President of Analytics Lab Services at IBM. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Sauro.
114. Gijs Van Weijen, former IBM Analytics WW Business Executive ECM/Cloud Content Services. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Sauro.
115. Greyson Kountz, former IBM Digital Business Automation Sales Specialist. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Townsley.
116. Mitch Baumann, former IBM Executive Director, Sales & Customer Success - Hybrid Cloud, Data & AI - U.S. Retail, CPG, T & T. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Townsley.
117. Tushar Bajaj, former IBM Cloud - Regional Sales Manager. This person has knowledge of IBM's pattern and practice of discrimination related to Plaintiff Townsley.
118. Talley Parker, scope of authority in representing IBM before EEOC, factual content of IBM EEOC Position Statement.
119. Alison Marshall, scope of authority in representing IBM before EEOC, factual content of IBM EEOC Position Statement.
120. IBM Corporate Designee, all subjects set forth in Plaintiff's Complaint, IBM's Answer, EEOC Position Statement, written discovery responses, etc.
121. Jonathan Langley, prior Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
122. Catherine A. Rodgers, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
123. Edwin Ruis, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
124. Henry Gerrits, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
125. Phil McGonegal, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's

- pattern and practice of discrimination.
126. David Ho Eng, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 127. Brian Haupt, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 128. Brian Miller, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 129. Mark Johnson, prior Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 130. Andrew Tsounos, prior Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 131. Ryan Mount, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 132. Robert Gasiorowski, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 133. Jim Lundy, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 134. Pamela Brister, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 135. Jennifer Holloway, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 136. Rae Ann Alton, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 137. Diane Delaney, Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 138. Gerald Iacono, prior Plaintiff in a lawsuit against IBM. This person has knowledge of IBM's pattern and practice of discrimination.
 139. Current and former IBM employees that have filed EEOC complaints or lawsuits against IBM alleging IBM engaged in age discrimination.
 140. Other IBM personnel not currently known to Plaintiffs but whose identity Plaintiffs are likely to learn in discovery.
 141. Debra Richards, EEOC NY District Office Investigator.
 142. Mabel Tso, EEOC NY District Office Investigator.
 143. Judy Keenan, EEOC NY District Office Director.
 144. The Custodian of Records for the Equal Employment Opportunity Commission may have knowledge of records pertaining to Plaintiffs' charge of discrimination and the EEOC's investigation, if any, thereof.

145. Obed Louissant, IBM Employee, SVP, Transformation & Culture. Testimony regarding the pattern and practice of discrimination at IBM.
146. Stephen Kelley, IBM Employee, VP HR. Testimony regarding the pattern and practice of discrimination at IBM.
147. Lisa Mihalik, IBM Employee, VP HR. Testimony regarding the pattern and practice of discrimination at IBM.
148. Tom Fleming, IBM Employee, VP HR. Testimony regarding the pattern and practice of discrimination at IBM.
149. Carrie Altieri, IBM Employee, VP HR. Testimony regarding the pattern and practice of discrimination at IBM.
150. Zane Zumbahlen, Former IBM Employee, HR. Testimony regarding the pattern and practice of discrimination at IBM.
151. Deb Butters, Former IBM Employee, VP HR. Testimony regarding the pattern and practice of discrimination at IBM.
152. Thomas Stachura, IBM Employee, VP Talent Solutions & People Analytics. Testimony regarding the pattern and practice of discrimination at IBM.
153. Iain Stark, Former IBM Employee, VP HR. Testimony regarding the pattern and practice of discrimination at IBM.
154. Robbin Suess, IBM Employee, VP HR. Testimony regarding the pattern and practice of discrimination at IBM.
155. Paula Jarvis, IBM Employee, Business Operations Program Manager. Testimony regarding the pattern and practice of discrimination at IBM related to Plaintiff Rosa Davidson.
156. Joseph Berti, IBM Employee, VP Offering Management. Testimony regarding the pattern and practice of discrimination at IBM related to Plaintiff Rosa Davidson.
157. Robert Picciano, Former IBM Employee, SVP & GM. Testimony regarding the pattern and practice of discrimination at IBM related to Plaintiff Thanh Do.
158. Lou Singer, IBM Employee, VP Finance. Testimony regarding the pattern and practice of discrimination at IBM related to Plaintiff Thanh Do.
159. Christine Muckensturm, IBM Employee, VP Finance. Testimony regarding the pattern and practice of discrimination at IBM related to Plaintiff Thanh Do.
160. Jojari Cannon, IBM Employee, Director Cloud. Testimony regarding the pattern and practice of discrimination at IBM related to Plaintiff Janet Gelpman.
161. Brandon-Jo Mouna, IBM Employee, HR Director. Testimony regarding the pattern and practice of discrimination at IBM related to Janet Gelpman.
162. Mark Johnson, IBM Employee, HR Partner. Testimony regarding the pattern and practice of discrimination at IBM related to Janet Gelpman.
163. Alex Brown, IBM Employee, Finance. Testimony regarding the pattern and practice of

- discrimination at IBM related to Plaintiff Janet Gelphman.
164. John Considine, Former IBM Employee, VP Cloud. Testimony regarding the pattern and practice of discrimination at IBM related to Plaintiff Janet Gelphman.
 165. Ed Fung, IBM Employee, VP GTS. Testimony regarding the pattern and practice of discrimination at IBM related to Plaintiff Titon Hoque.
 166. Brenda Swatek, IBM Employee, VP GTS HR. Testimony regarding the pattern and practice of discrimination at IBM related to Plaintiff Titon Hoque.
 167. Rebecca Culleton, IBM Employee, HR Leader. Testimony regarding the pattern and practice of discrimination at IBM related to Titon Hoque.
 168. David Smith, IBM Employee, Director GTS. Testimony regarding the pattern and practice of discrimination at IBM related to Plaintiff Michael Kelly.
 169. Tim Eddy, IBM Employee. Testimony regarding the pattern and practice of discrimination at IBM related to Plaintiff Michael Kelly
 170. Denis Kennelly, IBM Employee, GM IBM Cloud. Testimony regarding the pattern and practice of discrimination at IBM.
 171. Paulo Carvao, IBM Employee, GM IBM Distribution Market. Testimony regarding the pattern and practice of discrimination at IBM related to Plaintiff Charles Townsley.
 172. Bridget van Kralingen, IBM Employee, SVP Global Markets. Testimony regarding the pattern and practice of discrimination at IBM.
 173. Annette Favorite, IBM Employee, VP HR. Testimony regarding the pattern and practice of discrimination at IBM.
 174. Peter Lynt, Former IBM Employee, GM GTS. Testimony regarding IBM service delivery and resource strategies.
 175. Bettine Van Meeuwen, Former IBM Employee, Plaintiff in a lawsuit against IBM. This person has knowledge of the pattern and practice of discrimination at IBM.
 176. Joanna Daly, VP, Compensation, Benefits, & HR business development, former VP, Talent - information regarding IBM's culture, employment branding, recruitment strategies, hiring/firing patterns, RIFs, best HR practices, and similar subjects.
 177. Brian Perrigino, HR Workforce Analytics - information regarding workforce analysis; information regarding the pattern and practice of discrimination at IBM.
 178. Rob Thomas, Senior VP Global Markets - information regarding the pattern and practice of discrimination at IBM.
 179. Martin Jetter, Senior VP and Chairman IBM Europe - information regarding IBM's culture, workforce transformation, employment branding, recruitment strategies, hiring/firing patterns, RIFs, best HR practices, and similar subjects.
 180. Jonathan DeBusk, Director, Talent Selection - information regarding workforce analytics and similar subjects
 181. Pietro Mazzoleni, Head of People Data and AI Platform, Strategy, & Execution - information regarding workforce analytics and similar subjects

182. Edward Barbini, VP Communications at Kyndryl, former VP External Relations - information regarding external messaging at IBM and the pattern and practice of discrimination at IBM.
183. Kevin Kubicki, Director of Talent - information regarding IBM's culture, workforce transformation, employment branding, recruitment strategies, hiring/firing patterns, RIFs, best HR practices, and similar subjects.
184. Eric Clementi, SVP Sales & Distribution, Chairman Europe - information regarding IBM's culture, workforce transformation, employment branding, recruitment strategies, hiring/firing patterns, RIFs, best HR practices, and similar subjects.
185. Carolyn Austin, Senior HR Business Partner - information regarding the pattern and practice of discrimination at IBM.

Discovery in this case is ongoing, accordingly, Plaintiffs reserve the right to supplement.

II. DESIGNATION OF PROPOSED TRIAL EXHIBITS

1.	<p>IBMK-000000001 - IBMK-000188003</p> <p>IBMK-000000001 - IBMK-000188003 include, but is not limited to, documents containing the following:</p> <ul style="list-style-type: none"> • Emails and attachments of Virginia Rometty, • Emails and attachments of Diane Gherson • Emails and attachments of Martin Schroeter • Emails and attachments of James Kavanaugh • Emails and attachments of Ken Keverian • Emails and attachments of Erich Clementi • Emails and attachments of Jon Iwata • Emails and attachments of Alan Wild • Emails and attachments of Carrie Altieri • Emails and attachments of Annette Favorite • Emails and attachments of Thomas Fleming • Emails and attachments of Obed Louissaint • Emails and attachments of Thomas Stachura • Emails and attachments of Edward Barbini • Emails and attachments of Carol Gordon • Emails and attachments of Zane Zumbahlen • Emails and attachments of Brian Perrigino • Drafts and final versions of planning documents used by IBM to analyze its workforce • Drafts and final versions of Fall or Spring Plans • Drafts and final versions of slide decks used to discuss talent strategies at IBM • Documents that contain age information of IBM employees • Depositions and exhibits of Joanna Daly • Depositions and exhibits of Alan Wild
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	<ul style="list-style-type: none"> • Depositions and exhibits of Sam Ladah • Depositions and exhibits of Diane Gherson
2.	IBMK-D-000001 - IBMK-D-000011
3.	IBMK-DAV-0000001-0000822
4.	IBMK-D0-0000001-0001368
5.	IBMK-GEL-0000001-0001231
6.	IBMK-HOQ-0000001-0001647
7.	IBMK-KEL-0000001-0001468
8.	IBMK-NOF-0000001-0001280
9.	IBMK-SAU-0000001-0000773
10.	IBMK-TOW-0000001-0001508
11.	Plaintiffs 0001-0519
12.	Davidson 0001-0537
13.	Do 0001-0375
14.	Gelphman 0001-1669
15.	Hoque 0001-0187
16.	Kelly 0001-0228
17.	Noffsinger 0001-0155
18.	Sauro 0001-0277
19.	Townsley 0001-0603
20.	The deposition and exhibits of Laura Pimentel (2-11-22)
21.	The deposition and exhibits of Sam Ladah (2-14-22)
22.	The deposition of IBM employees or former employees prior to trial, including but not limited to any corporate representatives.
23.	Documents identified by Plaintiffs in their reports and the demonstrative aids, and summaries, they create prior to trial.
24.	Public statements made by IBM or its employees

Discovery in this case is ongoing, accordingly, Plaintiffs reserves the right to supplement.

III. DESIGNATION OF EXPERTS

The following individuals are hereby designated as potential testifying experts who Plaintiffs may call. They are designated as individuals with expert knowledge within their respective area of expertise and may be called upon to testify in Court and/or through their records. Plaintiffs reserve the right to timely supplement their response and to identify additional rebuttal expert witnesses in accordance with the Federal Rules of Civil Procedure and orders of the Court. Plaintiffs reserve the right to elicit expert testimony from any and all expert witnesses designated

by Defendant. Plaintiffs further reserve the right to call undesignated rebuttal expert witnesses whose testimony cannot reasonably be foreseen until the presentation of evidence by Defendant at trial.

Retained Experts

1. Mark Rambin, CPA
1717 Main Street, Suite 3380
Dallas, Texas 75201
214-965-8534

Mr. Rambin is a forensic accountant and economic analyst. He has performed an analysis of the past economic damages sustained by each Plaintiff and anticipated future damages as a result of Defendant's wrongful conduct alleged in the pleadings.

See Mr. Rambin's report, attached hereto, for the information and documents described in FRCP 26(a)(2)(B)(i)-(vi). The materials reviewed by Mr. Rambin containing the facts and data used to support his opinions as listed in his report can be viewed through the link provided to Defendant.

Any demonstrative aids or summaries prepared by Mr. Rambin prior to trial will be based on documents and information identified in his report.

2. Plaintiffs will supplement with their statistical expert in 30 days, per agreement with Defense counsel.

Non-Retained Experts

In addition, Plaintiffs hereby designate the following non-retained expert on attorney fees:

1. Austin Kaplan
Kaplan Law Firm
406 Sterzing St.
Austin, TX 78704
512-553-9390
Attorney for Plaintiffs

The qualifications of Mr. Kaplan are set forth in his CV attached. Pursuant to Local Rule CV-54, Plaintiffs' claimed attorney fees are to be presented by motion post-verdict.